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Attorneys for Defendant Target Stores, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Robert Griffith, a single man,

Plaintiff,

v.

Target Stores, Inc., a Minnesota corporation,

Defendant.

NO.

NOTICE OF REMOVAL

Defendant Target Stores, Inc., by and through undersigned counsel, files this Notice of Removal of this action to the United States District Court for the District of Arizona and states as follows:

1. On or about September 4, 2019, this action was commenced against Defendants in the Superior Court of the State of Arizona, in and for the County of Maricopa under the caption *Robert Griffith v. Target Stores, Inc., et al.* Copies of the initial pleadings are attached hereto as Exhibit A. Defendant was served by process on November 27, 2019.

2. Target Stores, Inc. is a Minnesota Corporation with its principal place of business in Minneapolis, Minnesota. According to the Complaint, Plaintiffs are residents and citizens of Maricopa County, Arizona.

3. This Court has original jurisdiction over the civil action pursuant to 28 U.S.C. § 1332 in that the matter in controversy exceeds the sum or value of \$75,000 exclusive of interest and costs, and the action is between citizens of different states.

1 While Plaintiff's Complaint does not specify precise damages claimed, Plaintiff has
2 undergone a second surgery procedure which was disclosed on January 23, 2020, and,
3 since that date, Plaintiff's counsel disclosed that the current medical specials are
4 approximately \$30,000 and the amount in controversy exceeds \$75,000. Based upon this
5 information, the amount in controversy exceeds the jurisdictional limits for diversity
6 jurisdiction. Therefore, this action may be removed to this Court pursuant to the
7 provisions of 28 U.S.C. § 1441, et seq.

8 4. Written notice of the filing of this Notice of Removal will be given to
9 all adverse parties as required by law and a true and correct copy of this Notice will be
10 filed with the Clerk of the Superior Court of the State of Arizona, in and for the County of
11 Maricopa.

12 5. A Notice of Filing Notice of Removal was filed with the Superior
13 Court and a copy of the same is attached as Exhibit B.

14 WHEREFORE, Defendant Target Stores, Inc. respectfully requests that this
15 action be removed to this Court.

16 DATED this 28th day of January 2020.

17 JONES, SKELTON & HOCHULI, P.L.C.
18

19 By /s/ Jefferson T. Collins
20 Jefferson T. Collins
21 40 North Central Avenue, Suite 2700
22 Phoenix, Arizona 85004
23 Attorneys for Defendant Target Stores, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January 2020, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Kathy Kleinschmidt